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Robert L. Williams, Jr., Director

Bonnie H. Rogers, Asst. Director

January 3, 1995

Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

RE: CC Docket No. 94-102, RM-8143

Dear Sirs:

I am responding to comment on the Notice of Proposed Rule Making listed above regarding revisions of the Commission's rules to ensure compatibility with Enhanced 9-1-1 Emergency Telephone Systems. However, I would first like to take this opportunity to thank you for the position you have taken in this matter and the strong support it provides to those of us in the emergency services profession. The contents of this Rule Making, once it is passed and implemented, will have a positive impact on our ability to receive requests for public safety services for years to come. Many of the requirements listed in the Rule Making are issues which have needed to be addressed for quite some time to provide citizens equal access to 9-1-1 systems and technology regardless of the type of telephone device the citizen is using. The contents of this Rule Making address this type of an issue and I have great pleasure in knowing you are supporting public safety professionals on this issue.

Topic III of the Rule Making on Compatibility of PBX Equipment with 911 Systems lists some very critical issues as related to this subject which must be addressed to provide the quickest response possible when dialing 911 in an emergency.

22. 911 Availability. PBX equipment must be required to route any call when the caller dials 911 or 9-911, depending on the type of PBX System, immediately to the Public Safety Answering Point responsible for the jurisdiction where the call was placed from. Nothing in a PBX System should prevent a person from dialing 911 or 9-911 to access emergency services when using this type or any type of telephone system. Any person or company using a PBX System manufactured or imported prior to the implementation date of the rules must be labelled with a warning describing the PBX's limitations or specific instructions on placing a call to 911.

23. Attendant Notification. PBX equipment should be required to alert an attendant or other on-premises personnel when a call is placed to 911. The PBX System should also provide the attendant with the location the call was placed from if the system does not provide this information to the Public Safety Answering Point. Many times schools, hotels, and other places which use a PBX type telephone systems will have security officers, nurses, emergency medical technicians, etc. working on-premises which can assist in an emergency. PBX equipment should not allow the attendant to "bridge on" to a 911 call or interrupt a 911 call for the purpose of establishing a three-way conversation. This could cause some type of confusion which could impede the delivery of public safety services.

24. ALI database maintenance. Accurate database maintenance is extremely vital to an Enhanced 911 service and the overall delivery of public safety services. Regulations should clearly define who is responsible for database maintenance related to installation and changes in a PBX System. The owner of a PBX System must be made responsible for notifying the agency or company in charge of data base maintenance of any changes or additions in telephone sets on the PBX System. The exact location of every telephone in a PBX System is critical to the proper function of an Enhanced 911 System.

26. Station Number Identification through 31. Implementation. No additional comments on these items at this time.

Topic IV of the Rule Making on the Compatibility of Wireless Services with Enhanced 911 also lists some very critical issues. Wireless communications equipment such as cellular telephones and PCS/PCN equipment pose the biggest threat to the success of an Enhanced 911 System. Presently, cellular telephones can access Enhanced 911 Systems in some areas in the United States, but the Public Safety Answering Point does not receive the telephone number or location of the person calling 911. This can preclude a public safety response if the caller cannot speak for some reason. Two examples of this would be during a crime in progress, such as a car jacking, where the caller does not want the criminal to know a call has been placed to 911 or during a medical emergency if the caller is alone and is choking. Another problem with the current level of technology with cellular access to 911 is the calls are not always automatically routed to the Public Safety Answering Point having jurisdiction over the area where the call is made from. This too creates major problems for 911 employees and can cause a delay in getting the public safety response started.

41. 911 Availability. 911 must be available to any person using a wireless communications device regardless of their location and without any form of validation. This must occur in both the callers regular service area and on a "roaming basis". This feature should be available one year after the effective date of the order adopting the rules in this proceeding.

42. Grade of service. Federal standards are not warranted at this time and may not be possible due to the varying levels of service and technological differences in systems.

44. 911 Call Priority. Any call to 911 must be given priority over any other call on a mobile radio network. I personally feel a call to 911 should interrupt an existing non-emergency call on the network. A person reporting a crime in progress, fire or medical emergency should not be placed in queue and required to wait for the next available cellular site, line, etc.

44. User Location Information. Knowing the location of a caller or incident is the most significant piece of information in the delivery of public safety services. Without a location we cannot dispatch field personnel to a request for help. Due to not being familiar with the technological difficulties the vendors of this type of equipment will be faced with I feel a five (5) year phase in plan would be appropriate. However, vendors and providers of wireless services should be highly encouraged to migrate to this technology as soon as possible. Latitude and longitude information would be a reasonable means of determining a callers location.

52. Re-ring/call back. This is a much needed feature of wireless systems when a call is place to 911. Presently, our E911 ALI and ANI equipment display "911-000" if the call is being made from a cellular telephone. It would be a significant improvement if the telephone number of the cellular or other wireless communications device is displayed on our E911 ALI and ANI screens. A three (3) year phase in plan to begin providing this information should be reasonable for vendors and providers of wireless systems.

53. Common Channel Signalling. No comment on this at this time.

54. Acess to test telephone devices (TTY). This too is extremely critical to allow all citizens equal access to 911 systems. A one year effective date from the time the rules in this proceeding are implemented should be sufficient time for providers of wireless services to meet these requirements.

I have no additional comments regarding this NPRM and would like to thank you for taking the time to review the comments I have submitted. Again, thank you for the stance you have taken in putting together this NPRM to work on giving everyone equal access to 911 regardless of the type of telephone device being used.

Sincerely,

Robert L. Williams, Jr.

RLW/rw

cc: File